

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

TOMMY BROWN,  
*on their behalf and on behalf of other  
similarly situated persons*

Plaintiff,

v.

TRANSWORLD SYSTEMS, INC.,  
PATENAUDE & FELIX, APC, U.S. BANK,  
NA. NATIONAL COLLEGIATE STUDENT  
LOAN TRUST 2004-1, NATIONAL  
COLLEGIATE STUDENT LOAN TRUST  
2004-2, NATIONAL COLLEGIATE  
STUDENT LOAN TRUST 2005-1,  
NATIONAL COLLEGIATE STUDENT LOAN  
TRUST 2005-2, NATIONAL COLLEGIATE  
STUDENT LOAN TRUST 2005-3,  
NATIONAL COLLEGIATE STUDENT LOAN  
TRUST 2006-1, NATIONAL COLLEGIATE  
STUDENT LOAN TRUST 2006-2,  
NATIONAL COLLEGIATE STUDENT LOAN  
TRUST 2007-1, and NATIONAL  
COLLEGIATE STUDENT LOAN TRUST  
2007-2,

Defendants.

Case No: 20-cv-00680

PROPOSED SCHEDULE FOR MOTIONS  
FOR CLASS CERTIFICATION AND LOAN  
OWNERSHIP

Pursuant to the Court's minute order dated February 24, 2023, the parties submit the following proposed schedule for bringing a Class Certification Motion and any Dispositive Motion relating to loan ownership:

Event	Deadline
Deadline to Join Additional Parties and to Amend Pleadings	April 19, 2023
Plaintiff's Disclosure of Experts Relating to Class Certification & Disclosure of Available Deposition Dates <sup>1</sup>	August 31, 2023
Defendants' Disclosure of Experts Relating to Class Certification & Disclosure of Available Deposition Dates	October 30, 2023
Discovery Deadline for Class Certification Fact Issues	November 29, 2023
Plaintiff's Disclosure of Rebuttal Experts Re: Class Certification & Disclosure of Available Deposition Dates for Rebuttal Expert	November 29, 2023
Defendants' Disclosure of Rebuttal Experts Re: Class Certification & Disclosure of Available Deposition Dates for Rebuttal Expert	January 5, 2024
Deadline to Complete Expert Depositions	January 28, 2024
Plaintiff's Motion for Class Certification Due	February 27, 2024
Any Defendant May File a Dispositive Motion Relating to Loan Ownership related to Plaintiff Due	February 27, 2024
Defendants' Response to Plaintiff's Motion for Class Certification Due	March 28, 2024
Plaintiff's Response to Any Dispositive Motion Relating to Loan Ownership related to Plaintiff Due	March 28, 2024
Plaintiff's Reply to Motion for Class Certification Due	April 26, 2024
Any Reply on Motion Relating to Loan Ownership related to the Plaintiff Due	April 26, 2024
Hearings on Motion for Class Certification and Trusts' Motion Relating to Loan Ownership	To be set by the Court
Class Notice and Opt-Out Period, Expert Disclosures Relating to Merits, Fact Discovery, All Other Dispositive Motions, Pre-Trial and Trial Deadlines	To be set by the Court after ruling on class certification and loan ownership

<sup>1</sup> The disclosure of available deposition dates by each party shall mean that upon disclosure of an expert the disclosing party shall provide four dates their expert is available for deposition at the time the expert's report is disclosed. The opposing party shall have five days to confirm their availability in response. If the opposing party responds within five days the disclosing party agrees to produce its expert for deposition and consider document requests to the expert without a subpoena subject to F.R.C.P. 26 and relevant case law limiting discovery regarding expert reports.

JOINTLY SUBMITTED this 30th day of March, 2023.

HENRY & DEGRAAFF, P.S.

By: /s/ Christina L. Henry  
Christina L. Henry, WSBA 31273  
113 Cherry St, PMB 58364  
Seattle, WA 98104  
Telephone: 206.330.0595  
Facsimile: 206.400.7609  
[chenry@HDM-legal.com](mailto:chenry@HDM-legal.com)

Counsel for Plaintiff  
BORISON FIRM, LLC

By: /s/ Scott Borison  
Scott Borison, Pro Hac Vice  
1900 S. Norfolk St., Suite 350  
San Mateo, CA 94403  
[scott@borisonfirm.com](mailto:scott@borisonfirm.com)

Counsel for Plaintiff

CORR CRONIN LLP

By: /s/ Emily J. Harris  
Emily J. Harris, WSBA No. 35763  
Benjamin C. Byers, WSBA No. 52299  
1001 Fourth Avenue, Suite 3900  
Seattle, WA 98154  
[eharris@corrchronin.com](mailto:eharris@corrchronin.com)  
[bbyers@corrchronin.com](mailto:bbyers@corrchronin.com)

Attorneys for Transworld Systems Inc.

CONSUMER LAW CENTER, LLC

By: /s/ Phillip Robinson  
Phillip Robinson, Pro Hac Vice  
10125 Colesville Road, Suite 378 Silver Spring,  
MD 20901  
[phillip@marylandconsumer.com](mailto:phillip@marylandconsumer.com)

Counsel for Plaintiff  
SESSIONS, ISRAEL & SHARTLE

By: /s/ Bryan C. Shartle, Esq.  
Bryan C. Shartle, Pro Hac Vice  
Justin Homes, Pro Hac Vice  
Bradley St. Angelo, Pro Hac Vice  
3850 North Causeway Boulevard, Suite 200  
Metairie, LA 70002  
[bshartle@sessions.legal](mailto:bshartle@sessions.legal)  
[jhomes@sessions.legal](mailto:jhomes@sessions.legal)  
[bstangelo@sessions.legal](mailto:bstangelo@sessions.legal)

Attorneys for Transworld Systems Inc.

JONES DAY

By: Albert J. Rota  
Albert J. Rota, Pro Hac Vice  
2727 North Harwood St.  
Dallas, TX 75201  
[ajrota@jonesday.com](mailto:ajrota@jonesday.com)

Attorneys for U.S. Bank National Association

PERKINS COIE LLP

LEE SMART, P.S., INC.

By: /s/ Kristine E. Kruger

By: /s/ Marc Rosenberg

Kristine E. Kruger, WSBA No. 44612

Marc Rosenberg, WSBA No. 31034

Thomas N. Abbott, WSBA No. 53024

1800 One Convention Place

1201 Third Avenue, Suite 4900

701 Pike St.

Seattle, WA 98101

Seattle, WA 98101

Telephone: 206.359.8000

Mr@leesmart.com

Facsimile: 206.359.9000

[KKruger@perkinscoie.com](mailto:KKruger@perkinscoie.com)

Attorneys for Patenaude & Felix, APC

[TAbbott@perkinscoie.com](mailto:TAbbott@perkinscoie.com)

Attorneys for Defendants U.S. Bank

National Association, National

Collegiate Student Loan Trust 2004-1,

National Collegiate Student Loan Trust

2004-2, National Collegiate Student

Loan Trust 2005-1, National Collegiate

Student Loan Trust 2005-2, National

Collegiate Student Loan Trust 2005-3,

National Collegiate Student Loan Trust

2006-1, National Collegiate Student

Loan Trust 2006-2, National Collegiate

Student Loan Trust 2007-1, National

Collegiate Student Loan Trust 2007-2